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*Counsel for Plaintiff International Fur Trade Federation*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

INTERNATIONAL FUR TRADE  
FEDERATION, an unincorporated  
association;

Plaintiff,

– against –

CITY AND COUNTY OF SAN  
FRANCISCO; and

DR. GRANT COLFAX, an individual, in  
his official capacity as Director of the  
San Francisco Department of Public  
Health;

Defendants.

Case No. 3:20-cv-00242-RS

**DECLARATION OF ROBERT  
ZIMBAL IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT**

Date: July 2, 2020  
Time: 1:30 p.m.  
Courtroom: 3

Hon. Richard Seeborg

1 I, Robert Zimbal, declare as follows:

2 1. My family owns and operates Zimbal Minkery (“Zimbal”), founded in  
3 1954 in Sheboygan Falls, Wisconsin. Our farm is one of the largest mink producers in  
4 the United States. The Zimbal family takes pride in raising the highest-quality mink in  
5 the world, and has won many awards at industry events for the quality of our mink. Our  
6 awards have included everything from top lots at the auction houses to best mink  
7 awards at international mink show events.

8 2. Zimbal must comply with all Wisconsin laws concerning the operation of  
9 our farm, including, of course, all such laws regarding the treatment of our animals and  
10 our environmental responsibilities. On top of these laws, Zimbal is a member of Fur  
11 Commission USA (“FCUSA”) and is certified through FCUSA to be in compliance  
12 with the “Standard Guidelines for the Operation of Mink Farms in the United States”  
13 (the “Standards”). The Standards exceed our legal requirements for humane treatment  
14 in all aspects of our farming, including vigilant attention to nutritional needs; clean,  
15 safe, and appropriate housing; prompt veterinary care; consideration for the animal’s  
16 disposition and reproductive needs; and elimination of outside stress. As a certified  
17 farm, Zimbal’s mink are raised in compliance with these Standards.

18 3. Zimbal’s animal welfare practices also contribute to environmental  
19 sustainability in Wisconsin. For example, Zimbal minks’ food consists of byproducts  
20 from local businesses in the food industry that would otherwise go to a landfill. Zimbal  
21 uses the minks’ waste as a natural fertilizer for our and other farmers’ fields of corn,  
22 grain, and soybeans. Zimbal sells the minks’ carcasses to rendering facilities, where the  
23 resulting oil is used in cosmetics and the rest of the carcass is turned into natural  
24 additives for the pet food industry as well as used for biodiesel.

25 4. Zimbal’s mink pelts are sold through the fur industry’s three major auction  
26 houses: the North American Fur Auction (“NAFA”) (until recently), located in Canada;  
27 SAGA Furs, located in Finland; and Copenhagen Fur, located in Denmark. Zimbal  
28 pelts are purchased at those auctions by manufacturers such as Reich Furs and

1 Pologeorgis Furs, both family-owned businesses located in New York, who make them  
2 into fur products and sell them to retailers all over the United States, including through  
3 retailers like Neiman Marcus and Saks Fifth Avenue.

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1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct.

3 Dated: May 15, 2020

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Robert Zimbal